

Before the
Federal Communications Commission
Washington D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Review of the Commission's Broadcast) MM Docket No. 98-204
and Cable Equal Employment Opportunity) MM Docket No. 96-16
Rules and Policies and Termination)
Of the EEO Streamlining)
Proceeding)

To: The Commission

JOINT REPLY COMMENTS OF EIGHT BROADCAST GROUPS

The undersigned broadcasters file these joint reply comments to stress their full and unequivocal support for the Commission's goal in this proceeding of promoting equal employment opportunity in the broadcast industry. Benedek Broadcasting Corporation, The Chronicle Publishing Company, LIN Television Corporation, Midwest Television, Inc., Paxton Media Group, Inc., Post-Newsweek Stations, Inc., Raycom Media, Inc., and Spartan Communications, Inc. (the "Broadcast Groups"), together own and operate 98 broadcast stations across the country – from rural to urban areas and from small and mid-sized to larger markets. The Broadcast Groups take EEO responsibilities very seriously (whether or not imposed by specific FCC requirements) and have diligently pursued their common goal of advancement of minority and female employment opportunities at their stations for many years.

As one demonstration of their support for the EEO objectives sought to be advanced by the FCC in this proceeding, the Broadcast Groups have voluntarily continued to adhere to the long-standing basic tenets of the FCC's EEO policy even

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when no longer legally required to do so. The Broadcast Groups will continue to pursue a variety of EEO efforts of this type in the future in furtherance of their common commitment to the principle of sensitivity and responsiveness to the concerns of all members of the communities that their stations serve, including the needs of minorities and women.

The Broadcast Groups briefly describe below some of the numerous activities that have contributed to the success of their efforts to advance the diversity of employment at their stations. The exact mix of EEO efforts varies among different broadcast groups – and sometimes even among stations in the same group – according to what has been found to work best under local conditions. While no single list could accurately reflect each station's efforts, the following examples reflect some of the ways in which the Broadcast Groups' stations are already advancing the Commission's EEO objectives.

- ♦ ***Frequent contacts with community leadership.*** In addition to seeking minority and female referrals as job openings occur, the Broadcast Groups seek new sources of referrals, as well as referrals, through ongoing relationships with minority and female organizations in local communities. By so doing, the Broadcast Groups create additional networking opportunities for minority and female job seekers. Many individual stations, for example, have formed relationships with minority-oriented publications, used minority group leaders as formal or informal sounding boards on community relations and employment issues, and in some cases have formed community advisory panels with minority as well as female participation. Contacts also come in the form of involvement by stations and/or station employees

in minority and female organizations and activities, including as emcee or moderator for sponsored events, through service on boards, participation in mentoring programs, etc. Over the years, the Broadcast Groups have found that such relationships promote better EEO performance by linking stations and station personnel to informal minority job networks.

♦ ***Participation in local and national job fairs, conventions and career days.***

These events allow the Broadcast Groups and their stations to engage in formal and informal networking, including soliciting resumes from audiences of potential applicants and encouraging female and minority interest in broadcast careers. The Broadcast Groups send representatives to minority- or female-specific events sponsored by such groups as the National Association of Hispanic Journalists, the National Association of Black Journalists, the Asian American Journalists Association, American Women in Radio and Television, various colleges and universities, various state and local groups (e.g., the California Chicano News Media Association), and others. Stations also attend general-interest events, such as those regularly sponsored by the National Association of Broadcasters ("NAB"). The Broadcast Groups' experience has been that job fairs, conventions, career days and similar events (regardless of whether they are designed to be minority- or female-specific) help stations come in contact with a bigger overall pool of potential minority and female applicants.

- ♦ ***Internship programs.*** The Broadcast Groups believe that recruiting and encouraging minority and female participation in internship programs are an integral part of an effective EEO program, as such participation often leads to jobs in the

broadcast industry. The Broadcast Groups strive for strong minority and female participation in their regular internship programs and actively seek qualified minority and female internship candidates. In some cases, stations establish additional internship opportunities just for minority students or specifically target appeals for internship applications at colleges and universities with significant minority populations. Qualified and interested interns are always considered and often selected for employment.

- ◆ ***Internal training programs.*** Once hired, minority and female employees improve their skills and their advancement potential through formal and informal on-the-job training. At some stations, promising minority or female candidates who lack appropriate credentials for their preferred jobs are first hired into lower-level positions on a trainee basis and considered for higher-level openings as they develop appropriate skills. Other stations have established temporary trainee positions designed to prepare minority and/or female candidates for permanent jobs, including key programming and news department positions. On-the-job training and trainee programs assist female and minority candidates in developing the skills needed to succeed in the broadcast industry and frequently lead to advancement at the same station or elsewhere in the industry.
- ◆ ***Participation in outside minority job training and recruitment programs.*** The Broadcast Groups utilize programs offered by sponsoring groups who have special expertise in minority and female job placement. Examples of programs that have contributed to the Broadcast Groups' success in this area include: the Minorities in Broadcast Training Program, the Broadcast Skills Bank, programs sponsored by the

major broadcast networks, national minority journalism association programs, Urban League programs, programs sponsored by NAB, and programs sponsored by state associations of broadcasters. These programs supplement active minority participation in the many other training and recruitment programs sponsored by industry groups, including NAB, the Radio and Television News Directors Association, the National Press Photographers Workshop, the American Marketing Association, and others.

- ◆ ***School programs.*** Many stations participate in shadowing programs, career days and other events sponsored by local schools. This participation demonstrates the Broadcast Groups' commitment to encouraging interest in broadcast careers throughout all segments of the community, even when the chance of specific benefits to a station's own hiring goals is remote. In the long run, the Broadcast Groups believe that these efforts will do a great deal to promote interest among women and minorities in broadcast careers.
- ◆ ***Scholarships.*** Scholarships – either standing alone or in conjunction with internships – help to direct promising minority and female students who are entering college or in college toward jobs in the broadcast industry. Acting through individual stations, the Broadcast Groups fund scholarship programs or participate in third-party scholarship programs with local colleges and universities. A number of those programs are targeted at minority candidates.
- ◆ ***Internet recruitment.*** The broadcast industry is making swift progress in exploiting the potential of the internet to give stations access to much broader and more

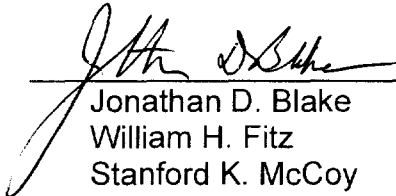
diverse applicant pools than has ever been feasible in the past. The Broadcast Groups know from experience that large applicant pools tend to contain more qualified female and minority candidates, and thus firmly believe that internet recruitment should be central to future EEO efforts. Within individual Broadcast Groups, station management personnel already use intranet sites, electronic mail, or bulletin boards to exchange information about job candidates and field e-mail inquiries from potential employees. Some stations already post job openings on various web sites, including sites maintained by broadcast industry organizations and publications, general-interest job search sites, and sites directed at minority audiences.

- ◆ ***Internal hiring policies/reviews of EEO effectiveness.*** The Broadcast Groups make conscientious efforts to assess the impact that recruitment and hiring decisions have on EEO performance and voluntarily monitor the effectiveness of their minority and female recruitment efforts in various ways. For example, some stations do this by establishing committees to conduct periodic reviews of hiring. Others designate a single EEO-sensitive manager or management committee to approve or consult on individual hiring decisions. Stations also maintain and disseminate internal policies designed to ensure that hiring and promotion decisions are made according to fair, unbiased procedures.

Through these and other efforts, the Broadcast Groups maintain an active commitment to the same EEO goals espoused by the Commission. The Broadcast Groups plan to continue these efforts for years to come as part of their larger commitment to serving all members of their communities regardless of race, ethnic origin, or gender.

Respectfully submitted,

BENEDEK BROADCASTING
CORPORATION; THE CHRONICLE
PUBLISHING COMPANY; LIN TELEVISION
CORPORATION, MIDWEST TELEVISION,
INC; PAXTON MEDIA GROUP, INC.; POST-
NEWSWEEK STATIONS, INC.; RAYCOM
MEDIA, INC; and SPARTAN
COMMUNICATIONS, INC., owners of the
stations listed in Annex A



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ANNEX A

BENEDEK BROADCASTING CORPORATION

(and its Licensee Subsidiary)

KAUZ-TV, Wichita Falls, TX
KCOY-TV, Santa Maria, CA
KDLH, Duluth, MN
KGWC-TV, Casper, WY
*KGWL-TV, Lander, WY
*KGWR-TV, Rock Springs, WY
KGWN-TV, Cheyenne, WY
*KSTF, Scottsbluff, NE
*KTVS, Sterling, CO
KHQA-TV, Hannibal, MO/Quincy, IL
KMIZ, Columbia, MO
KOSA-TV, Odessa, TX
WBKO, Bowling Green, KY
WHOI, Peoria, IL
WHSV-TV, Harrisonburg, VA
WIBW-TV, Topeka, KS
WIFR, Freeport/Rockford, IL
WILX-TV, Onondaga/Lansing, MI
WSAW-TV, Wausau, WI
WTAP-TV, Parkersburg, WV
WTOK-TV, Meridian, MS
WTRF-TV, Wheeling, WV
WTVY-TV, Dothan, AL
WWLP, Springfield, MA
WYTV, Youngstown, OH

THE CHRONICLE PUBLISHING COMPANY

(and its Broadcast Division)

KAKE-TV, Wichita, KS
*KLBY, Colby, KS
*KUPK-TV, Garden City, KS
KRON-TV, San Francisco, CA
WOWT, Omaha, NE

LIN TELEVISION CORPORATION

(and its Licensee Subsidiaries)

KXAN-TV, Austin, TX
*KXAM-TV, Llano, TX
WAND, Decatur, IL
WANE-TV, Fort Wayne, IN
WAVY-TV, Portsmouth, VA
WISH-TV, Indianapolis, IN
WIVB-TV, Buffalo, NY
WOOD-TV, Grand Rapids, MI
WTNH-TV, New Haven, CT

MIDWEST TELEVISION, INC.

(and its Licensee Subsidiary)

KFMB(AM), San Diego, CA
KFMB-FM, San Diego, CA
KFMB-TV, San Diego, CA
WCIA(TV), Champaign, IL
*WCFN(TV), Springfield, IL
WMBD(AM), Peoria, IL
WMBD-TV, Peoria, IL
WPBG(FM), Peoria, IL

PAXTON MEDIA GROUP, INC.

WPSD-TV, Paducah, KY

POST-NEWSWEEK STATIONS, INC.

(and its Licensee Subsidiaries)

KPRC-TV, Houston, TX
KSAT-TV, San Antonio, TX
WDIV(TV), Detroit, MI
WJXT(TV), Jacksonville, FL
WKMG-TV, Orlando, FL
WPLG(TV), Miami, FL

*Satellite station

RAYCOM MEDIA, INC.
(and its Licensee Subsidiaries)

KFVS-TV, Cape Girardeau, MO
KNDO(TV), Yakima, WA
*KNDU(TV), Richland, WA
KOLD-TV, Tucson, AZ
KSFY-TV, Sioux Falls, SD
*KABY-TV, Aberdeen, SD
*KPRY-TV, Pierre, SD
KSLA-TV, Shreveport, LA
KTVO(TV), Kirksville, MO
KWWL(TV), Waterloo, IA
WACH(TV), Columbia, SC
WAFB(TV), Baton Rouge, LA
WAFF(TV), Huntsville, AL
WDAM-TV, Laurel/Hattiesburg, MS
WECT(TV), Wilmington, NC
WFLX(TV), West Palm Beach, FL
WLII(TV), San Juan, PR
*WSUR-TV, Ponce, PR
WLUC-TV, Marquette, MI
WMC, Memphis, TN
WMC-FM, Memphis, TN
WMC-TV, Memphis, TN
WNWO-TV, Toledo, OH
WOIO, Shaker Heights/Cleveland, OH
WPBN-TV, Traverse City, MI
*WTOM-TV, Cheboygan, MI
WSTM-TV, Syracuse, NY
WTNZ, Knoxville, TN
WTOC-TV, Savannah, GA
WTVM, Columbus, GA
WTVR-TV, Richmond, VA
WXIX-TV, Newport, KY/Cincinnati, OH

SPARTAN COMMUNICATIONS, INC.
(and its Licensee Subsidiary)

KIMT, Mason City, IA
KWCH-TV, Wichita, KS
*KBSD-TV, Ensign, KS
*KBSH-TV, Hays, KS
*KBSL-TV, Goodland, KS
WBTW, Florence, SC
WJBF, Augusta, GA
WKRG-TV, Mobile, AL
WMBB, Panama City, FL
WRBL, Columbus, GA
WSPA-TV, Spartanburg, SC
*WNEG-TV, Toccoa, GA

*Satellite station